

NORTON ROSE FULBRIGHT US LLP
JEFFREY MARGULIES (BAR NO. 126002)
KAYLEE YANG (BAR NO. 303464)
555 California Street
Suite 3300
San Francisco, California 94104
Telephone: (213) 892-9200
Facsimile: (213) 892-9494
jeff.margulies@nortonrosefulbright.com
kaylee.yang@nortonrosefulbright.com

NORTON ROSE FULBRIGHT US LLP
GERALDINE YOUNG (admitted *pro hac vice*)
1301 McKinney, Suite 5100
Houston, Texas 77010
Telephone: (713) 651-5151
Facsimile: (213) 651-5246
geraldine.young@nortonrosefulbright.com

Attorneys for Defendants
IRICO GROUP CORP. AND
IRICO DISPLAY DEVICES CO., LTD

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No.: 07-cv-05944 JST

MDL No. 1917

This document relates to:

ALL INDIRECT PURCHASER ACTIONS

ALL DIRECT PURCHASER ACTIONS

**DECLARATION OF GERALDINE W.
YOUNG IN SUPPORT OF IRICO
DEFENDANTS ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
BEIJING MATSUSHITA COLOR CRT
CO., LTD. MATERIAL SHOULD BE
SEALED PURSUANT TO CIVIL LOCAL
RULES 7-11 AND 79-5(f)**

1 I, Geraldine W. Young, declare as follows:

2 1. I am a member of the bar of the State of Texas and admitted to practice before this
3 Court *pro hac vice*. I am an attorney with Norton Rose Fulbright US LLP, which represents
4 Defendants Irico Group Corporation (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico
5 Display,” collectively, “Irico” or the “Irico Defendants”) in this action. I make this Declaration in
6 support of Defendant Irico Group Corporation and Irico Display Devices Co., Ltd.’s Motion for to
7 Consider Whether Beijing Matsushita Color CRT Co., Ltd. Material Should be Sealed Pursuant to
8 Civil Local Rules 7-11 and 79-5(f) (the “Motion”). If called as a witness, I could and would testify
9 to the matters set forth in this declaration of my own personal knowledge.

10 2. Attached hereto as Exhibit 49 is a true and correct copy of a certified translation of
11 a document produced by defendant Beijing-Matsushita Color CRT Corp. (hereinafter, “BMCC”) in this litigation and bearing the Bates label BMCC-CRT000142063E.

13 3. Attached hereto as Exhibit 52 is a true and correct copy of a certified translation of
14 a document produced by BMCC in this litigation and bearing the Bates label BMCC-
15 CRT000540532.

16 4. Attached hereto as Exhibit 70 is a true and correct copy of a document produced by
17 BMCC in this litigation and bearing the Bates label BMCC-CRT000105586.

18 I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th
19 day of May, 2024 in Houston, Texas.

20 Dated: May 10, 2024

21 /s/ Geraldine Young
22 GERALDINE YOUNG (admitted *pro hac vice*)
23 1301 McKinney, Suite 5100
24 Houston, Texas 77010
25 Telephone: (713) 651-5151
26 Facsimile: (213) 651-5246
27 Geraldine.young@nortonrosefulbright.com
28

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **Declaration of Geraldine W. Young** was filed via CM/ECF on May 10, 2024, and as a result has been served on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

By: Jeffrey Margulies

Jeffrey Margulies